

PEGGY A. DICKINSON  
PRESIDENT



STEPHANIE JACKSON  
VICE-PRESIDENT

STANLEY BEAN  
PLANT SUPERVISOR

*Ragland Telephone Co., Inc.*

POST OFFICE BOX 577  
RAGLAND, ALABAMA 35131

205-472-2141  
FAX 205-472-2145

EB 06-36  
EB-06-TC-060

**CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006**

February 6, 2006

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, as revised by Public Notice issued on February 2, 2006, please find attached our company's submission in response to the Enforcement Bureau's request for the most recent period citing the requirements of § 64.2009(e) of the Commission's Rules.

Should you have any questions regarding this filing, please direct them to the undersigned.

Sincerely,

Ragland Long Distance, Inc.

Peggy Dickinson  
President

cc: Bryon McCoy via e-mail [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Best Copy and Printing, Inc., via e-mail [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**Certification of CPNI FILING FEBRUARY 6, 2006  
OF  
RAGLAND LONG DISTANCE COMPANY, INC.**


**EB-06-TC-060  
EB Docket No. 06-36**

TO: FEDERAL COMMUNICATIONS COMMISSION, ENFORCEMENT BUREAU

In response to the Commission's Public Notice, DA 06-223 (released January 30, 2006), and revised by Public Notice, DA 06-258 (released February 2, 2006), Ragland Long Distance Company, Inc. ("Ragland Long Distance") states as follows:

1. Ragland Long Distance is as an affiliate of Ragland Telephone Company, Inc., a small rural local exchange carrier. Ragland Telephone Company, Inc., while certificated by the Alabama Public Service Commission currently has no customers. So long as Ragland Long Distance has no customers, it cannot afford protection to any Customer Proprietary Network Information ("CPNI").
2. Because Ragland Long Distance had no CPNI in its control in 2005, Ragland Long Distance certifies that it has not violated the Commission's rules regarding the proper use of CPNI.
3. Ragland Long Distance's interpretation of 47 C.F.R. § 64.2009, entitled "Safeguards required for use of customer proprietary network information" is that so long as CPNI is not used by telecommunications carriers, the compliance certificate requested by the Enforcement Bureau in Public Notice DA 06-223, and revised by Public Notice, DA 06-258, is not required. Specifically, that Section provides, among other things, that a carrier "must implement a system...*prior to* the use of CPNI..." 47 C.F.R. § 64.2009(a). Ragland Long Distance, however, does not have a compliance certificate for the year 2005 because it has no customers.
4. Ragland Long Distance will immediately adopt an appropriate 2006 compliance certificate in the event that it acquires customers and CPNI is later used.

Ragland Long Distance Company, Inc.

By:   
Peggy Dickinson  
Its: President

DATED: 2/6/66